

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MARYLAND**

TAMMIE FRALEY, et al.,,

Plaintiffs,

v.

MERITUS MEDICAL CENTER, INC., et
al.,

Defendants.

Case No. 1:20-cv-0103-RDB

**CONSENT MOTION TO CORRECT TYPOGRAPHICAL ERROR IN JOINT
MOTION TO MODIFY THE SCHEDULING ORDER &
MEET AND CONFER REPORT**

COME NOW Plaintiffs with consent of all parties, by and through undersigned counsel, and respectfully submit this Consent Motion to the Court to correct a typographical error in the previously submitted motion to Modify the Scheduling Order and Meet and Confer Report. In support thereof, the parties state the following:

1. On July 13, 2020, the Court granted the parties' Consent Motion to Modify the Scheduling Order. In doing so, the Court relied upon the document submitted by the parties.

2. Unfortunately, an oversight by the parties in which version of the agreed upon dates was to be filed led to several of the dates being inaccurate to what all parties believed what was the proper schedule.

3. Having now noticed the error in the drafting and consulting with each other, the parties wish to correct the Scheduling Order to reflect the following:

Deadline	Original Date	Proposed Date
Joint Request for Early Settlement/ADR Conference	7/13/2020	7/13/2020
Report about Deposition Hours	7/13/202	7/13/2020
Initial report whether there is unanimous consent to proceed before a United States Magistrate Judge	7/13/2020	7/13/2020
Deadline for conference about discovery of electronically stored information.	7/13/2020	7/13/2020
Moving for joinder of additional parties and amendment of pleadings	8/13/2020	8/13/2020
Plaintiff's Rule 26(a)(2) disclosures	8/28/2020	9/30/2020
Defendants' Rule 26(a)(2) disclosures	9/28/2020	11/30/2020
Plaintiff's rebuttal Rule 26(a)(2) disclosures	10/13/2020	1/10/2021
Rule 26(e)(2) Supplementation of Disclosures and Responses	10/19/2020	2/1/2021
Discovery Deadline, Submission of Status Report	11/12/2020	5/1/2021
Requests for Admissions	11/18/2020	6/1/2021
Dispositive Pretrial Motions	12/11/2020	7/1/2021

WHEREFORE, Plaintiffs respectfully requests that this Honorable Court amend the scheduling order as indicated above and on the attached Order for good cause.

Respectfully submitted,

PAULSON & NACE, PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2020, I caused a true and exact copy of the foregoing to be served via the Court's Online File System upon:

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